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Attorneys for Plaintiff/Petitioner Jackie Tidwell

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JACKIE TIDWELL,

Plaintiff/Petitioner,

vs.

ZHEJIANG JIANDI TRADING & INDUSTRIAL
CO., LTD.,

Defendant/Respondent,

and

TV PRODUCTS USA, INC., WALMART STORES,
INC., BIG LOTS STORES, INC.

Garnishees.

NOTICE OF MOTION

Index No.: 13-cv-5701 (AKH)

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law dated October 10, 2013, the annexed Declaration of David Graff, dated October 10, 2013 together with the exhibits annexed thereto and made a part thereof, petitioner Jackie Tidwell, by its attorneys, Anderson Kill P.C., shall move the United States District Court for the Southern District of New York, at the United States Courthouse, 500 Pearl Street, New York, New York, at a time and date to be set by the Court, pursuant to Rule 55 of the Federal Rules of Civil Procedure to enter a default judgment against Wal-Mart Stores,

Inc., and for such other, further or different relief as this Court deems just proper and equitable.

Dated: New York, New York
October 10, 2013

ANDERSON KILL & OLICK, P.C.

By:


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To:

Zhejiang Jiandi Trading & Industrial Co. Ltd.
Shihou Industrial Zone
Yongkang,
Zhejiang China (mainland) 321306

WalMart Stores Inc.
c/o CT Corporation System
111 Eighth Avenue
New York, New York 10011

To:

TV Products USA Inc.
230 Fifth Avenue, Suite 605
New York, New York 10001

Big Lots Stores Inc.
c/o Corporation Service Company,
80 State Street
Albany, New York 12207